

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

**KATHY TOWNSEND GRIFFIN, *et.al.*,**

Plaintiffs,

vs.

ECF CASE  
17-CV-5221 (LIS)

**EDWARD CHRISTOPHER SHEERAN, *et.al.*,**

Defendants.

NOTICE OF MOTION—  
PLAINTIFFS' THIRD MOTION  
*IN LIMINE*

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**PLEASE TAKE NOTICE**, that upon the accompanying Memorandum of Law, and all prior proceedings had herein, the enumerated Plaintiffs, collectively, will move this Court, before the Honorable Louis L. Stanton, at the Daniel Patrick Moynihan United States Courthouse, Courtroom 21C, 500 Pearl Street, New York, New York, 10007, on a date and time to be determined by the Court, for an Order excluding the inclusion and/or admission into evidence of Defendants' Exhibits 302-303, constituting pre-suit correspondence and attachments between Parties' counsel.

The reasons and grounds for this motion are more fully described in the accompanying papers.

Oral argument, if any shall be directed by the Court, shall be held on a date and at a time designated by the Court.

**DATED** this 15<sup>th</sup> day of March, 2023.

FRANK & RICE, P.A.

Respectfully Submitted,

/s/ Patrick R. Frank, Esq.

Patrick R. Frank, Esq.

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